

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF MICHIGAN

SOUTHERN DIVISION

FILED - GR

September 4, 2012 11:40 AM

TRACEY CORDES, CLERK
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY anm / Scanned am/9.4DOUGLAS T. JOHNSON,
Plaintiff,

-v-

1:12-cv-935

Robert J. Jonker
U.S. District Judge
Hugh W. Brenneman
U.S. Magistrate JudgeCOUNTY OF KENT, KENT
COUNTY SHERIFFS DEPT.
* UNKNOWN HEALTH CARE
PROVIDER,Defendants, /DOUGLAS T. JOHNSON
Plaintiff In Pro Per
703 Ball Avenue, N.E.
Grand Rapids, MI 49503
(616) 990-1798 /COMPLAINTNow comes the Plaintiff Douglas T. Johnson, In Pro Per, and for

his complaint against the Defendants County of Kent, Kent County

Sheriff's Dept., and Unknown Health Care Provider states as follows:

1. Plaintiff Douglas T. Johnson, at all times relevant to this

complaint, has been a detainee of the Defendants being held

at the Kent County Correctional Facility in Grand Rapids, Michigan,

2. Defendant County of Kent is a political subdivision within the

State of Michigan that owns & funds the operation of the Kent

County Correctional Facility located in Grand Rapids, Michigan,

3. Defendant Kent County Sheriff's Dept. oversees the day-to-day

operations of the Kent County Correctional Facility,

4. Defendant Unknown Health Care Provider is a private corporation

contracted by the County of Kent to provide health & dental care

services to Detainees held at the Kent County Correctional Facility,

5. On or about August 14th 2012 Plaintiff was booked into and detained

ever since by the Defendants at the Kent County Correctional Facility,

6. Upon initial booking Plaintiff advised Defendants that he was

diagnosed with a chronic health condition, specifically, Multiple Sclerosis.

7. Plaintiff was subsequently asked by Defendants who his health care providers were, what medications he was on, and who his pharmacy was.

8. Plaintiff provided all the information requested in paragraph 7 above to Defendants and was told that they would contact his pharmacy and order the medications if they were not part of their normal formulary.

9. Upon information and belief, Defendants contacted Plaintiff's pharmacy and obtained a list of Plaintiff's medications but have not provided Plaintiff any of the medications prescribed to treat his Multiple Sclerosis.

10. On or about August 27th, 2012 Defendants did receive one of the prescribed medications (Araner) but failed to keep it properly refrigerated rendering the medication unsafe to use.

11. Defendants have been so outspoken about not caring for Plaintiff's medical needs that they tried to pursue a 63rd District Court Judge during a Preliminary Examination that Plaintiff was somehow faking his illness,

12. As a result of Defendants' deliberate indifference to Plaintiff's medical needs Plaintiff has had to endure avoidable and

unnecessary pain & suffering that includes:

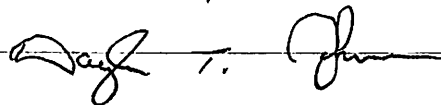
- a. Severe & Painful muscle spasms,
- b. Extreme Pain in Lower Extremities,
- c. Excessive Numbness in Arms & Hands,
- d. Blurred Vision,
- e. Continued Weight Loss,
- f. Sleep Deprivation,
- g. Other unknown disease progression.

13. In addition, Plaintiff has had to witness his wife suffer repeated seizures due to the stress created by the Defendants trying to persuade them to praise Plaintiff his medications,

WHEREFORE, Plaintiff respectfully requests this Honorable Court to order the following:

- a. That Defendants immediately provide Plaintiff his medications as has been long prescribed by his treating physicians, or in the alternative, release Plaintiff so he can care for his own medical needs,
- b. Award Plaintiff damages for the pain & suffering he has had to endure due to Defendants blatant & deliberate indifference to Plaintiff's medical needs,
- c. Award Plaintiff any other relief this Court finds appropriate.

Respectfully Submitted,



August 30th, 2012

Douglas T. Johnson

703 Boll Avenue N.E.

Grand Rapids, Michigan 49503

(46) 990-1798